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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION**

JESS J. DAVIES Plaintiff, vs. UNITED STATES ENVIRONMENTAL PROTECTION AGENCY; and ANDREW WHEELER,¹ Administrator, Defendants.	CV 17-115-H-BMM PLAINTIFF'S MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 37(e)
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¹ Pursuant to Fed. R. Civ. P. 25(d), the current Administrator of the Environmental Protection Agency, Andrew Wheeler, is automatically substituted for former Administrator Scott Pruitt.

I. **RELIEF REQUESTED**

Plaintiff moves for sanctions pursuant to Rule 37 (e) F. R. Civ. P. A Brief in Support of this Motion accompanies this Motion.

DATED this 22nd day July, 2020.

/s/ Linda Deola
Attorney for Plaintiff

/s/ Dan N. Fiorito
Attorney for Plaintiff, *Pro Hac Vice*